

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

.....x
NAZMI EREBARA,
Petitioner

Assigned to US Senior
District Court Judge
Clarence C. Newcomer

-against-

Index #
Civil/No. 02/3650

KENNETH ELWOOD, District Director,
Immigration and Naturalization Service, and
JOHN ASHCROFT, Attorney General
United States of America,

Respondents

.....x

S I R S:

PLEASE TAKE NOTICE THAT upon the annexed Affirmation of David E. Oltarsh dated August 5, 2002, the Stay of Deportation previously entered in this case by US District Court Judge Mary A. McLaughlin and upon the requested relief set forth in the Motion heretofore filed on or about July 26, 2002 with the Board of Immigration Appeals seeking to reopen Petitioner's deportation proceedings, and upon the previously filed Petition for a writ of Habeas Corpus, and upon all the papers and proceedings heretofore had herein Petitioner will move this Court on August 22, 2002 or soon thereafter as Counsel can be heard for an Order amending the previously issued stay of Petitioner's deportation and extending the stay to allow sufficient time for the Board of Immigration Appeals to consider Petitioner's Motion to Reopen including any appeals; and Petitioner further seeks an Order granting his immediate release from incarceration upon a suitable bond, if determined to be necessary, pending this determination and

pursuant to his previous filing on July 22, 2002 of an Order to Show Cause for his release; and for such other and further relief as to the Court may seem just and proper in the premises.

Dated August 5, 2002
New York, NY

OLTARSH & SSOCIATES, P.C.
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